

BakerHostetler

Baker&Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

Keith R. Murphy
direct dial: 212.589.4686
kmurphy@bakerlaw.com

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VIA ECF AND ELECTRONIC MAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 723
New York, New York 10004-1408
Bernstein.chambers@nysb.uscourts.gov

Re: Picard v. BAM L.P., et al. (Adv. Pro. No. 10-04390 (SMB))

Dear Judge Bernstein:

We are counsel to Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* and the estate of Bernard L. Madoff.

On behalf of all parties to the proceedings referenced above, we write to respectfully request an enlargement of time to file the Joint Stipulated Statement of Undisputed Material Facts, currently due on May 3, 2017. Specifically, the parties jointly request a four-week extension, which would make the new deadline May 31, 2017. The parties will submit their Joint Stipulated Statement of Undisputed Material Facts by that date, or otherwise inform the Court of their progress.

Respectfully submitted,

/s/ Keith R. Murphy

Keith R. Murphy

cc: Carole Neville (via email)